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1 **AIND**

2 **ADAM PAUL LAXALT**

3 **Attorney General**

4 **MICHAEL C. KOVAC**

5 **Deputy Attorney General**

6 **Nevada Bar No. 11177**

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14 **Attorneys for Plaintiff**

BY: 

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **STATE OF NEVADA,**

12 **Plaintiff,**

13 **v.**

14 **STEVEN MARTIN SHAW, ID#2694714,**

15 **Defendant(s).**

16 **Case No.: C-13-291557-1**

17 **Dept. No.: XII**

18 **AMENDED INDICTMENT**

19 Defendant STEVEN MARTIN SHAW is accused by the Grand Jury of Clark County,
20 Nevada, of INSURANCE FRAUD (a category D felony – NRS 686A.2815(3) and 686A.291)
21 within Clark County, Nevada, as follows:

22 **COUNT ONE**
23 **INSURANCE FRAUD**

24 **(Category D Felony – NRS 686A.2815(3) and 686A.291)**

25 Defendant STEVEN MARTIN SHAW and coconspirators Chad Gary Kruger and
26 Michael Joseph Hughes, on or about October 25, 2012, within Clark County, Nevada, did
27 knowingly and willfully, present or assist, abet, solicit, or conspire with another person to
28 present, or caused to be presented, to an insurer false or misleading information concerning a

1 material fact in support of a claim for benefits made under a policy of insurance issued
2 pursuant to the Nevada Insurance Code, to wit: Defendant SHAW and his coconspirators did
3 conspire to conceal a Suzuki motorcycle belonging to coconspirator Hughes so that Hughes
4 could report the motorcycle as stolen to Progressive Insurance and obtain an insurance
5 payment for the value of the vehicle.

6 All of which is contrary to the form, force, and effect of the statutes in such cases made
7 and provided, and against the peace and dignity of the State of Nevada.

8 DATED this 28th day of August, 2015.

9 ADAM PAUL LAXALT
Attorney General

10
11 By: Michael C. Kovac
12 MICHAEL C. KOVAC, ESQ.
13 Deputy Attorney General
14 Nevada Bar No. 11177

15 ENDORSEMENT: A True Bill

16 By:

17 Foreperson, Clark County Grand Jury
18 GJ#
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